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8 Attorneys for Federal Defendants

9 UNITED STATES DISTRICT COURT

10 NORTHERN DISTRICT OF CALIFORNIA

11 OAKLAND DIVISION

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14 MARC COHODES,) CASE NO. 20-cv-04015-SBA
15 Plaintiff,)
16 v.)
17 UNITED STATES DEPARTMENT OF)
JUSTICE, FEDERAL BUREAU OF)
INVESTIGATION, EXECUTIVE)
OFFICE FOR UNITED STATES)
ATTORNEYS, and CRIMINAL DIVISION OF)
UNITED STATES DEPARTMENT OF)
JUSTICE)
Defendants.)
21

) STIPULATION AND [PROPOSED] ORDER
CONTINUING CASE MANAGEMENT
CONFERENCE
Date: May 5, 2021
Time: 2:45 p.m.
Courtroom: via telephone conference

1 Defendants United States Department of Justice, Federal Bureau of Investigation (“FBI”), and
2 Executive Office for United States Attorneys (“EOUSA”), and the United States Department of Justice’s
3 Criminal Division (“Criminal Division”) (collectively, “Federal Defendants”), and Plaintiff Marc
4 Cohodes, by and through their counsel, hereby stipulate to continue the May 5, 2021 Case Management
5 Conference to June 3, 10 or 17, 2021, subject to the Court’s approval and for the reasons set forth below.

6 The FBI made its final release of pages on April 23, 2021, which Defendants’ counsel e-mailed
7 to Plaintiff’s counsel on April 27, 2021.

8 In addition, the FBI, EOUSA, and the Criminal Division prepared search descriptions that were
9 provided to Plaintiff’s counsel as a confidential settlement communication.

10 Plaintiff has provided some comments on certain redactions from earlier releases that it has
11 requested the FBI to consider. Counsel for Federal Defendants has also indicated that he is willing to
12 consider Plaintiff’s comments and questions regarding redactions and withheld pages in the FBI’s
13 release of records.

14 In light of these developments, the parties do not believe it would be a good use of the parties or
15 the Court’s resources to have a Case Management Conference on May 5, 2021. Rather, the parties
16 request that the Court continue the conference to June 3, 10 or 17 2021. The parties will continue to
17 work to see if any aspects of this case can be resolved.

18 Respectfully submitted,

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20 Dated: April 27, 2021

STEPHANIE M. HINDS
Acting United States Attorney

21
22 Michael T. Pyle*

23 Michael Pyle
24 Assistant United States Attorney
25 Counsel for Defendants United States Department of Justice, FBI,
26 Executive Office for United States Attorneys, and Criminal
Division

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28 *I certify that Plaintiff’s counsel authorized me to file this stipulation.

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2 Respectfully submitted,

3 Dated: April 27, 2021 THE NORTON LAW FIRM PC

4 George C. Harris

5 _____
6 George C. Harris
Counsel for Plaintiff Marc Cohodes

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PURSUANT TO STIPULATION, IT IS HEREBY ORDERED THAT:

8 The Case Management Conference scheduled for May 5, 2021 at 2:45 p.m. is continued to
9 June 17, 2021 at 2:30 p.m.

10 **IT IS SO ORDERED.**

11
12 Dated: April 27, 2021



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14 Hon. Saundra Brown Armstrong
United States District Judge